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Remarks

Reconsideration of the above-captioned application is respectfully requested. The allowance of Claims 1, 3, 4, and 9 and indicated allowability of Claims 2, 8, 11, 15, 19, 20, and 23 is gratefully acknowledged.

Non-elected Claim 21 has been canceled, and the antecedent basis discrepancies in Claims 8 and 13 have been cured herein. Regarding the indefiniteness rejections of Claims 2, 11, 15, 20, and 23 alleging that it is unclear how each element can turn on its own axle when there is only one gear train shaft, at the bottom of page 6 of the specification it is taught that in one non-limiting embodiment "the gear train shaft in the preferred embodiment is coupled with a cam 38 that preferably rotates through one hundred eighty degrees (180°). Both axles 28, 30 ride on the cam 38." Thus, the indefiniteness rejection is overcome.

Claim 22 has been rejected under 35 U.S.C. §102 as being anticipated by Zhang et al., USPN 6,528,782, and Claims 13, 14, and 17 have been rejected under 35 U.S.C. §103 as being unpatentable over Zhang et al. in view of Ghosh et al., USPN 6,108,226. Claims 24, 25, and 27 have been rejected under 35 U.S.C. §103 as being unpatentable over Zhang et al. in view of Knecht, USPN 3,070,345, and Claim 16 has been rejected under 35 U.S.C. §103 as being unpatentable over Zhang et al. in view of Ghosh et al. and Knecht.

Allowable dependent Claim 15 has been incorporated into independent Claim 13, leaving only independent Claim 22 at issue.

Claim 22 has been rejected by reading the shutter flap 1320 as the claimed "first and second valve element means", the support shaft 1329 as the claimed "gear train shaft", and pinion 1314 of the rack-and-pinion mechanism as the claimed "cam." Assuming for the moment the legitimacy of the examiner's implied finding that the solid disc shutter flap 1320 is structurally equivalent to the subject matter disclosed in the

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present specification (see 35 U.S.C. §112, sixth paragraph), what is clear is that the relied-upon "cam" (the pinion 1314) simply does not couple the relied-upon shaft 1329 to the relied-upon valve element means 1320. Instead, the support shaft 1329 appears to be glued or otherwise directly attached to the shutter flap 1320 without any coupling by the pinion 1314 whatsoever.

Furthermore, Claim 22 requires that the cam do more than couple the valve element means to the gear train shaft. It requires the cam to transform rotation of the gear train shaft to rotation of the valve element means. In marked contrast, the relied-upon support shaft 1329 rotates directly with the shutter flap 1320. There appears to be no rotational transformation going on at all between the two, much less rotational transformation between the two by operation of the pinion 1314.

The Examiner is cordially invited to telephone the undersigned at (619) 338-8075 for any reason which would advance the instant application to allowance.

Respectfully submitted,



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